

Joint Position Statement Supporting Regulation of PFAS as a Class



Per- and polyfluoroalkyl substances (PFAS) are a large group of man-made toxic chemicals used to make consumer products resistant to water, grease or stains. Human health studies have shown that exposure to certain PFAS may affect growth, learning, and behavior of infants and older children, lower a woman's chance of getting pregnant, interfere with the body's natural hormones, increase cholesterol levels, affect the immune system, and increase the risk of cancer.¹

The major types of human exposure sources for PFAS include contaminated drinking water and food contaminated with PFAS, including fish and shellfish. Other human exposure pathways include incidental soil/dust ingestion, dermal exposure and inhalation.

Approaching PFAS as a class for assessing exposure and biological impact is the best way to protect public health.² Assessing risks of chemicals having a similar mechanism of toxicity is not unusual and is similar to how other chemical groups such as dioxins and PCBs have been assessed and regulated.

A class approach is also consistent with environmental field data which consistently finds PFAS as a mixture of widely varying relative ratios and combinations which, in turn, may shift in response to other factors such as aerobic conditions. And further, a class approach is made necessary by the fact that manufacturers and responsible parties uniformly refuse to disclose PFAS product content and composition, arguing that such information is proprietary.

So far, 26 PFAS chemicals have been detected in or pose a threat to the Wisconsin's groundwater,³ and as analytical methods for PFAS continue to evolve and improve, this number will quickly escalate.

For these reasons, we are unable to support regulations or corresponding legislation that address only a very few PFAS compounds and that address only one pathway of exposure such as groundwater.

ENDORSED by the following 28 Wisconsin organizations:

Casa Maria Community
Code PFAS
Citizens for Safe Water Around Badger
Clean Water Action Council of Northeast Wisconsin
Concerned Friends and Neighbors
Crawford Stewardship Project
Family Farm Defenders
Farms Not Factories
Fire Fighter Cancer Foundation
Friends of Lake Wingra*
Four Lakes Green Party
Headwater LLC
Midwest Environmental Advocates
Midwest Environmental Justice Organization

Nukewatch
PFAS Community Campaign
People Empowered Protect the Land (PEPL) of Rosendale*
Physicians for Social Responsibility Wisconsin
Protect Wood County and Its Neighbors*
Sierra Club – John Muir Chapter
Sustain Rural Wisconsin Network
Twin Ports Action Alliance
Wisconsin Conservation Voters
Wisconsin Environmental Health Network (WEHN)
Wisconsin Environment
Wisconsin Network for Peace, Justice & Sustainability
Wisconsin Resources Protection Council
Wisconsin Wildlife Federation

*Added after April 4, 2019

For more information, contact:

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¹ CDC/ATSDR to Assess PFAS Exposure in Communities Near U.S. Military Bases, Press Release, February 21, 2019.

² Dr. Birnbaum (Director of the National Institute of Environmental Health Sciences and National Toxicology Program of the National Institutes of Health) in testimony before the Senate Committee on Homeland Security and Governmental Affairs, Subcommittee on Federal Spending Oversight and Emergency Management, Sept. 26, 2018.

³ S. Elmore, Wisconsin DNR, January 17, 2019 correspondence to Laura Olah, Executive Director, Citizens for Safe Water Around RE: Public Petition for Health Advisory Levels for PFAS in Groundwater and Drinking Water with Emphasis on the Tyco/Johnson Controls PFAS site - BRRTS Activity No. 02-38-580694.